

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ANNA LA FRONZA and NATALIA  
KUPIEC, individually and on behalf of all  
others similarly situated,

*Plaintiffs,*

v.

PEOPLECONNECT, INC., a Delaware  
corporation, INTELIOUS LLC, a Delaware  
limited liability company, INSTANT  
CHECKMATE, LLC, a Delaware limited  
liability company, TRUTHFINDER, LLC a  
Delaware limited liability company, and US  
SEARCH, LLC, a Delaware limited liability  
company,

*Defendants.*

Case No.: 1:21-cv-00280

Judge: Hon. Edmond E. Chang

**NOTICE OF WRITTEN CONSENT TO FILE AMENDED PLEADING AND  
PROPOSED BRIEFING SCHEDULE ON DISMISSAL MOTION**

Following the Court's May 27, 2021 minute entry, (dkt. 44), and the conference of counsel, Defendants PeopleConnect, Inc. and Intelious LLC ("Defendants") hereby provide their written consent, pursuant to Federal Rule of Civil Procedure 15(a)(2), to Plaintiffs Natalia Kupiec's and Anna La Fronza's filing of the Second Amended Complaint attached hereto as Exhibit A. Further, because the filing of the Second Amended Complaint will moot Defendants' pending motion to sever, (dkt. 39), the Parties respectfully request that the Court enter the following briefing schedule on PeopleConnect, Inc.'s and Intelious LLC's forthcoming dismissal motion:

- Opening brief due June 23, 2021
- Responsive brief due July 21, 2021

- Reply brief due August 11, 2021

Respectfully Submitted,

**NATALIA KUPIEC and ANNA LA FRONZA,**  
individually and on behalf of all others similarly  
situated,

Dated: June 2, 2021

By: /s/ Benjamin S. Thomassen  
One of Plaintiff's Attorneys

Benjamin H. Richman  
brichman@edelson.com  
Ari J. Scharg  
ascharg@edelson.com  
Benjamin Thomassen  
bthomassen@edelson.com  
EDELSON PC  
350 North LaSalle Street, 14th Floor  
Chicago, Illinois 60654  
Tel: 312.589.6370  
Fax: 312.589.6378

*Attorneys for Plaintiff Kupiec and the putative  
Class*

Philip L. Fraietta (admitted *pro hac vice*)  
pfraietta@bursor.com  
BURSOR & FISHER, P.A.  
888 Seventh Avenue  
New York, New York 10019  
Tel: 646.837.7150  
Fax: 212.989.9163

J. Dominick Larry  
nick@nicklarry.law  
NICK LARRY LAW LLC  
8 South Michigan Avenue, Suite 2600  
Chicago, Illinois 60603  
Tel: 773.694.4669  
Fax: 773.694.4691

*Attorneys for Plaintiff La Fronza and the putative  
Class*

Date: June 2, 2021

**PEOPLECONNECT, INC. and INTELIIUS LLC,**

By: /s/ Debbie L. Berman [with consent]

Wade A. Thomson, #6282174  
Debbie L. Berman, #6205154  
Clifford W. Berlow, #6292383  
JENNER & BLOCK LLP  
353 N. Clark Street  
Chicago, IL 60654-3456  
Telephone: 312 222-9350  
Facsimile: 312 527-0484  
wthomson@jenner.com  
dberman@jenner.com  
cberlow@jenner.com

Ian Heath Gershengorn (pro hac vice)  
JENNER & BLOCK LLP  
1099 New York Avenue, NW, Suite 900  
Washington, DC 20001-4412  
Telephone: 202 639-6000  
Facsimile: 202 639-6066  
igershengorn@jenner.com

*Attorneys for Defendants*